

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

)	
CLEMENT WOGHIREN,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO. 04-12148-WGY
)	
WYETH, and)	
)	
WYETH BIOPHARMA,)	
)	
Defendants.)	
)	

LOCAL RULE 16.1(D)(3) CERTIFICATION

The undersigned plaintiff, Clement Woghiren, and his counsel hereby certify that they have conferred with a view to establishing a budget for the costs of conducting the full course – and various alternative courses – of the litigation and to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in United States District Court for the District of Massachusetts Local Rule 16.4.

/S/
Clement Woghiren

/S/

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Dated: December 6, 2004